

EXHIBIT D



Renee Spence <spence@loevy.com>

Parks v. BPD - Request to Inspect

Shneur Nathan <snathan@nklawllp.com>

Wed, Jan 22, 2020 at 5:17 PM

To: Renee Spence <spence@loevy.com>

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Spence,

Are you available to meet and confer regarding this request on Monday afternoon between 1 and 3? My initial impression is that this appears unduly burdensome in light of the fact that these documents were already produced. Assuming plaintiff demonstrates a real need for this inspection, it will still be helpful to discuss the particulars of the inspection. Thanks.

Shneur

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